

Ameritech Michigan is seeking recovery of pole rentals which Ameritech Michigan pays to attach its own wires to the poles owned by other utilities! While never submitted as part of the record in this case, just days before MCTA's filing was due, Ameritech Michigan did provide MCTA with a workpaper dated September 26, 1996. That workpaper demonstrated that as part of its pole rate Ameritech Michigan was seeking to recover the pole rentals which Ameritech pays to attach its own wires to poles owned by other utilities. The inclusion of these costs not only defies common sense, but it directly violates the FCC methodology adopted by the MTA. (See, Letter from Kenneth Moran, FCC Common Carrier Bureau Accounting & Audits to Paul Glist, June 22, 1990, 5 FCC Rcd 3898 (1990); UACC Midwest, Inc. d/b/a United Artists Cable Mississippi Gulf Coast v South Central Bell Telephone Company, PA 91-0005 through PA 91-0009, DA 95-1363 (Common Carrier Bureau) (June 15, 1995).) In its supplemental filing dated January 16, 1997, Ameritech Michigan does not even attempt to deny this fact.

**E. Ameritech Michigan Does Not Dispute That It Duns Attaching Parties Based On Excessive Rates**

Ameritech Michigan does not dispute that it is sending dunning notices to parties which attach to its poles and is seeking to recover a \$2.88 pole rate, based on a tariff which was rejected by the MPSC Staff and withdrawn by Ameritech itself. Moreover, Ameritech Michigan tacitly admitted that this proposed rate was excessive, when it subsequently filed a \$1.97 pole rate. Rather than acknowledge its error and offer to rectify its erroneous collection activities, Ameritech Michigan makes a veiled threat to impose a \$4.95 per pole/per year rate on attaching parties. (See, Appendix A, p 3 of Ameritech Michigan's Supplemental Information filing, January 16, 1997.) Thus, Ameritech Michigan's solution for its failure to provide access to its poles at just and reasonable rates is to threaten those

who raised the issue with the Commission with an even more onerous and unsupported rate. Ameritech's threat is hollow, however, because, effective November 30, 1995, the Michigan Telecommunications Act made it illegal for Ameritech to change any pole rate that was not calculated in accordance with the FCC methodology adopted in §361 of the Act.

**F. Ameritech's Pole Rate Is Unjust And Unreasonable Because It Violates Michigan Law**

Ameritech claims that it proposed pole rate of \$1.97 is just and reasonable because it is lower than its previous MPSC-approved pole rate. What Ameritech conveniently ignores is that its pole rate is now subject to a different statutory standard which was recently adopted in Section 361 of the MTA. Unless and until Ameritech complies with the legal requirements mandated by this statute, its pole rates are inherently invalid, unjust and unreasonable. See, Northern Michigan Land & Oil Co v PSC, 211 Mich App 424; 536 NW2d 259 (1995).

**III. CONCLUSION**

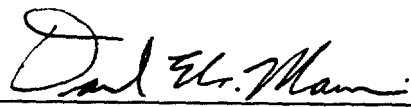
Despite its efforts to obfuscate the record with its January 16, 1997 filing, Ameritech Michigan has failed to refute any of the evidence presented by MCTA which clearly establishes that Ameritech Michigan is not providing access to its poles at just and reasonable rates. Conceding that the FCC formula is the appropriate pricing methodology for its pole rate, Ameritech Michigan has never presented on the record in this case any workpaper to demonstrate that its \$1.97 rate was properly calculated under that methodology. In fact, Ameritech Michigan offers not a single substantive criticism to MCTA's calculation showing that Ameritech Michigan's maximum allowable pole attachment rate is \$1.20. Further, Ameritech Michigan does not dispute that in calculating its \$1.97 rate, it included the pole

rents that it pays for attaching its own wires to the poles owned by other utilities. Finally, Ameritech Michigan does not dispute that it continues to send dunning notices to attaching parties seeking to collect a clearly excessive rate of \$2.88, based on an old tariff proposal which was rejected by the MPSC Staff and which Ameritech Michigan itself withdrew and replaced with a lower tariff rate.

Despite Ameritech Michigan's extensive filings regarding other issues in this case, it has offered no evidence whatsoever to satisfy the third item of the competitive checklist which requires access to poles at just and reasonable rates.

Respectfully submitted,

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Date: January 30, 1997

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LANSING,  
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48933

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, )  
to consider Ameritech Michigan's compliance . )  
with the competitive checklist in Section 271 )  
of the Telecommunications Act of 1996. )  
\_\_\_\_\_ )

Case No. U-11104

PROOF OF SERVICE

MICHIGAN PUBLIC SERVICE  
FILED

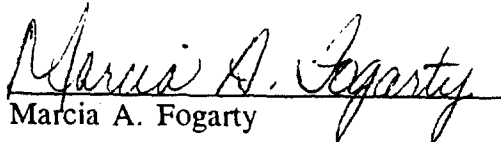
STATE OF MICHIGAN )  
 ) ss  
COUNTY OF INGHYAM )

JAN 30 1997

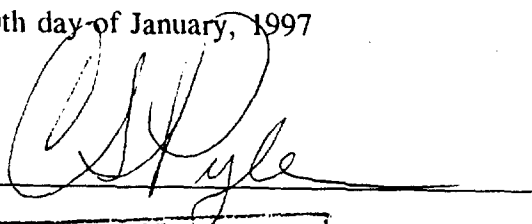
COMMISSION

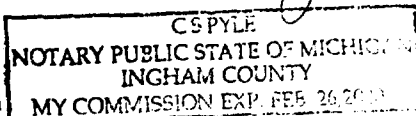
The undersigned, being first duly sworn, deposes and states that he served papers as follows:

1. Document(s) served: The Michigan Cable Telecommunications Association's Reply to Ameritech Michigan's Supplemental Information Filed on January 16, 1997
2. Served upon: See Attached List
3. Method of service: U.S. First Class Mail, unless noted as Hand Delivery
4. Date served: January 30, 1997

  
Marcia A. Fogarty

Subscribed and sworn to before  
me this 30th day of January, 1997





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January 31, 1997

Ms. Dorothy Wideman  
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MICHIGAN PUBLIC SERVICE  
FILED

JAN 31 1997

***Re: MPSC Case No. U-11104.***

COMMISSION

Dear Ms. Wideman:

Enclosed for filing in the above-referenced case is an original and fifteen copies of Ameritech Michigan's Reply to MFS' Submission of Information.

Very truly yours,

*Craig A. Anderson (ls)*

Enclosure

cc: All Parties of Record

CAA:jkt

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, )  
to consider Ameritech Michigan's compliance )  
with the competitive checklist in Section 271 )  
of the Telecommunications Act of 1996. )  
\_\_\_\_\_ )

Case No. U-11104

MICHIGAN PUBLIC SERVICE  
FILED

**AMERITECH MICHIGAN'S REPLY TO MFS'  
SUBMISSION OF INFORMATION**

JAN 31 1997

COMMISSION

Ameritech Michigan<sup>1</sup> submits the following additional information in response to the late-filed comments submitted by MFS Intelenet of Michigan, Inc. (MFS), dated January 14, 1997 and received on January 16, 1997.

MFS, until submission of its late-filed comments, had not previously participated in this proceeding. Moreover, it was not until their late filing with the Commission that MFS notified Ameritech Michigan that any of their allegations constituted a breach of the parties' approved interconnection agreement or were otherwise unlawful. To the extent that MFS' filing raises business and operational issues, Ameritech Michigan is committed to work cooperatively with MFS, under the framework and procedures of our interconnection agreement and all applicable laws and regulations, to resolve each and every concern.

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<sup>1</sup>Michigan Bell Telephone Company, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Michigan Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" (used interchangeably herein), pursuant to assumed name filings with the state of Michigan.



## **I. "Legal Issues"**

Most of the legal issues referenced by MFS were previously addressed in Ameritech Michigan's submission of information dated January 16, 1997 to which Ameritech Michigan now references in response to MFS.

MFS also makes the novel contention that Ameritech Michigan does not comply with the "separate directors" requirement of Section 272(b)(3). Even if Section 272 were properly before this Commission in this proceeding, the fact that Ameritech Michigan does not have a separate board of directors is entirely consistent with applicable corporate law. Nothing in the federal Act superseded state corporate law or would require that Ameritech Michigan institute a board of directors. Rather, the Act at most requires that if a board of directors exists, it be separate from that of Ameritech Michigan's long distance affiliate.

## **II. "Factual Matters"**

### **A.**

#### **1. "Predominantly Over Its Own Facilities"**

Although MFS asserts that its operations in Michigan do not meet the "predominantly over its own facilities" test in Section 271(c)(1)(A) of the federal Act, Ameritech Michigan initially notes that MFS is by no means the only competing provider of basic local exchange service in Michigan. Ameritech Michigan refers again to its January 16, 1997 filing with regard to the interpretation of the legal standard in the federal Act.

Ameritech Michigan also notes that MFS has indicated that it "provisions 222 access lines exclusively through its own facilities." However, as stated by Ameritech Michigan in its November 12, 1996 filing herein, MFS has over 2,700 end office integration trunks connecting their switching offices with

Ameritech Michigan's switching centers. One such trunk can support from 10 to 18 exchange access lines. Using conservative estimates, Ameritech Michigan has approximated that MFS' interconnection arrangements are supporting approximately 24,000 access lines. MFS also fails to mention the fact that the reciprocal exchange of local traffic between the two companies is approximately 5.5 million minutes of use per month between the two companies. While the precise number of local access lines involved in this traffic flow cannot be determined, Ameritech Michigan believes it is fair to assume it involves more than 222 access lines.

Moreover, in the following section, MFS also refers to 160 orders for unbundled high capacity facilities just within the last 6 months, which MFS claims it uses for both local exchange and private line service. Presumably, MFS also built additional high capacity facilities. MFS has not provided any specifics regarding these facilities which would provide the basis for any quantitative comparison; e.g., are any of MFS' access lines provisioned over high capacity facilities, which would permit, for example, the aggregation of numerous PBX trunks over a single access line, and correspondingly, enable the provision of multiple numbers of end user stations served by each PBX line. Similarly, comparative information is lacking with regard to the network access lines and unbundled loops being purchased by MFS from Ameritech Michigan.

MFS states it only has one switch in Michigan. Ameritech Michigan has previously indicated in prior filings that it believes MFS has two switches in Michigan; an AT&T 5ESS in Detroit and an Ericsson ACE in Southfield. MFS also acknowledges it has 128 route miles of fiber optic cable. MFS does not specify how many buildings are connected to these fiber optic facilities. Ameritech Michigan estimates that at least 100 buildings are connected to MFS' fiber facilities.

Finally, MFS' assertion that it is not a facilities-based provider is somewhat incredible in light of its other public statements. As demonstrated in the attachments to the joint affidavit of Robert G. Harris and David J. Teece, Volume 3.3, Appendix A, Part 2, of Ameritech Michigan's Section 271 application to the FCC (Docket 97-1), MFS, on its home page on the internet, touts itself as a facilities-based provider:

"At the forefront of this revolution is MFS, one of the first nationwide, **facilities based** companies to offer a complete range of communications service." (emphasis added)

In its May 29, 1996 press release announcing its offering of local service in Detroit (see attached), MFS further touted the fact that it is a facilities-based provider:

"[MFS] announced today that it is now offering a full range of local, **facilities based** telephone services over its 103-route mile fiber optic network in the greater Detroit metropolitan area.

'We're committed to delivering personalized customer service and tailored communications solutions, supported by **our reliable state-of-the-art network facilities**, to Detroit area businesses ...

\*\*\*

MFS ... greatly expands its presence in the greater metropolitan Detroit area, with this **end-to-end service offering over MFS' network**.

\*\*\*

This is the first agreement between a regional Bell operating company and a **facilities based competitor** which seeks to satisfy specific requirements of the Telecommunications Act of 1996." (emphasis added)

For MFS to now attempt to claim that they are not a facilities-based competitor is simply not credible.

## **2. "No Residential Customers"**

MFS states that it currently provides local exchange service only to business customers. However, MFS' tariffs on file with the Michigan Public Service Commission, consistent with the order granting a basic local exchange license to MFS and the requirements of the Michigan Telecommunications Act, offers residential service to all customers within the exchange service territories in which MFS operates. MFS' interconnection agreement establishes rates for the purchase of unbundled loops for both business and residence customers. MFS has apparently chosen to target its marketing efforts to business customers. Ameritech Michigan anticipates that at least in the short term, many of the licensed basic local exchange providers like MFS will focus their marketing efforts on more lucrative business customers. However, the current lack of residential customers is solely a result of MFS' own marketing decisions. As discussed in Ameritech Michigan's prior submission, the federal Act does not incorporate a "metrics" test.

Whether or not MFS has chosen to do so, Brooks Fiber is currently providing service to substantial numbers of the residential customers. Moreover, all of the five competing local exchange providers in Michigan that have tariffs on file with the Commission offer residential service to customers within the territories they serve. Accordingly, 65% (or 3.2 million) of the total number of access lines served by Ameritech Michigan today have a competitive alternative of at least two providers for basic local exchange service, including both business and residence customers. Many customers have choices from among at least four providers. These are not theoretical choices offered to Michigan consumers – these are actual, filed, effective tariff service offerings of licensed competitors offering services in compliance with the mandate of Michigan law and Commission regulation. These

alternative local exchange providers offer real competitive choices for the majority (approximately two-thirds) of Ameritech Michigan's existing customer access lines.

## **B. "Operational And Competitive Issues"**

### **1. "T1 Provisioning"**

The T1 services which are referred to by MFS are categorized as special access services under Ameritech Michigan's existing tariffs. Ameritech Michigan is unaware of the extent to which MFS is using these services to currently provision local exchange service to end user customers. To the extent that MFS is aggregating its local access lines over high capacity T1 facilities, the extent of MFS' local exchange operations may be understated, as discussed in the preceding section.

Ameritech Michigan acknowledges there have been delays in T1 provisioning intervals during 1996, primarily in the early part of the year. The intervals that were provided to MFS were the same intervals that were provided to any customer that requested T1 service, both retail and wholesale. Ameritech is addressing delays in its T1 intervals in part by hiring over 1,000 technicians, redesigning processes, and investing in the network infrastructure. The T1 intervals are currently running in the 8 day interval range, which is considerably better than previous performance.

Part of the difficulties faced by Ameritech Michigan in 1996 in forecasting workforce and facilities requirements was the lack of accurate forecast information from customers. Despite requests, competing providers like MFS have been unwilling to provide forecast information regarding their local service offerings and volume.

It is important to point out the T1 intervals mentioned in the MFS letter relate to existing tariffed access service provisioning, and do not relate to

resale or other unbundled network elements. Network element performance has been exceptional. For example, Ameritech installed 148 loops for MFS in October without missing one due date. In November, 43 loops were installed without a miss, and in December, 192 loops were installed, again without a miss.

## **2. "Unbundled Loop Provisioning"**

The issues raised by MFS are similar to those raised by Brooks Fiber with regard to the necessity for joint coordination of customer cutovers. Ameritech Michigan incorporates by reference its response to Brooks Fiber on this issue filed herein on January 15, 1997.

Ameritech Michigan has implemented procedures to work with providers such as MFS to accurately and promptly coordinate unbundled loop conversions. These procedures are designed to minimize any customer out of service time associated with the conversion from "bundled" exchange service to unbundled loop service.

MFS references several examples; however, MFS does not state how many of their 818 unbundled loops were installed on time. The process of converting exchange service involves manual steps and requires coordination of technicians in the central office, in the field, and in the network elements control center (NECC), in addition to coordination with MFS. Problems may occur with complex cutovers involving multiple telephone numbers and loops for the same customer. Although MFS claims that problems occurred in several instances, without specifics, it cannot be determined if these problems are unique, infrequent situations or part of an underlying process problem. Without specific details, Ameritech Michigan cannot perform the required root cause analysis to determine what may have caused the problem. Ameritech Michigan will continue to work with MFS to address these operational issues.

It should be noted that coordination of unbundled loop conversions involves both MFS and Ameritech Michigan. If MFS intends to convert an existing customer's live service, MFS must provide Ameritech Michigan with appropriate ordering information so that the disconnection of the existing service and the installation of the unbundled loop are coordinated and related on orders. In addition, since the orders in question are multi-line businesses, it is necessary for the proper loop assignments and any number portability functionality to be related. Without additional information, it is impossible to determine whether MFS is referring to a problem caused solely by Ameritech or by MFS' own failure to provide Ameritech Michigan with adequate information to properly coordinate the orders.

MFS cites an instance where an Ameritech Michigan technician was late for a cutover appointment. Again, without specifics, it is impossible for Ameritech Michigan to determine the cause of the problem.

Finally, MFS refers to a situation where a line was not properly "optioned," and that it took three weeks to reoption the line. Again, without any additional detail, it is impossible to determine whether Ameritech Michigan was solely responsible for these delays. It is possible for a competing provider to place an initial order and later wish to change something after the service is already installed. Such a situation would require a new service order to make the requested changes. The change is subject to available facilities and force/load/dispatch scheduling at the time the order is placed. These circumstances are often different than those encountered when the initial order was placed.

### **3. "NPA-NXX Issue"**

MFS had previously mentioned sporadic problems with NXX code routing and ratings. Ameritech Michigan asked for specific numbers in an effort to investigate and resolve any problems. On January 27, 1997, MFS provided

Ameritech with information on NXX issues to begin root cause analysis of the situation and the steps necessary to correct any problem. A copy of the information faxed by MFS on January 27, 1997 is attached. Ameritech Michigan is investigating based on this information. Ameritech Michigan believes some of the problems described by MFS are a result of MFS' unilateral decision to move a prefix code (NXX) to different locations in Illinois.

#### **4. "Reciprocal Compensation"**

The situation described by MFS does not in any way involve a "unilateral change" in the economics of doing business in Michigan; this is a blatant red herring. On September 12, 1996, the Commission issued an order in Case No. U-10860, which stated in relevant part:

"Finally, until local call termination charges are implemented for all local traffic [specifically, EAS traffic from independent LECs], no such charges shall be made to competing providers. In that manner, the nondiscriminatory requirements may be given effect."

Based on its understanding of that order, Ameritech Michigan sent a letter to MFS and other carriers initiating an interim suspension of reciprocal compensation arrangements. As acknowledged by MFS, after subsequent discussions between the parties and clarification from the Commission, within approximately 11 days, Ameritech Michigan advised MFS that, as requested by MFS, Ameritech Michigan would not suspend reciprocal compensation arrangements between the parties. No suspension was ever initiated, and there was never any impact on MFS' economics of doing business in Michigan.



## **5. "Fiber Splice"**

Initially, it should be noted that the collocation points referenced by MFS were ordered in October 1994. MFS had not proceeded with their fiber cable placement until July 1996 to complete these collocation sites.

At the Troy-Somerset location, MFS did not have their fiber cable to the specified meet manhole at the time MFS contacted Ameritech in July 1996. Ameritech Michigan could not proceed until MFS had completed this work. This partially contributed to the delays and subsequent rescheduling. Ameritech's records indicate that on August 7, 1996, MFS was ready for the splicing to occur. The splicing was completed on August 31, 1996.

At the Troy-Main location, Ameritech completed the requested work on August 21, 1996. This site required additional central office work to meet MFS' requested riser cable requirements. Furthermore, Ameritech spent 1.5 days troubleshooting the fiber splice at MFS' insistence that Ameritech had improperly spliced the cables. The Ameritech technician subsequently determined that MFS' fiber cable was "open" at splice locations within MFS' own cable. Thus, MFS' own network problems contributed to delays in providing service at Troy-Main.

## **6. "Ameritech's Term Products"**

MFS' contention on this issue is somewhat confusing. Ameritech does provide volume and term discounts to retail customers, and those volume and term discounts are available to resellers at a wholesale discount. It appears MFS is suggesting that it should be entitled to obtain volume and term discounts without making any volume and term commitment, apparently because such a commitment would be inconsistent with MFS' marketing strategy. Such an absurd interpretation is not mandated by any law or Commission requirement.


MFS also appears to be contesting the Commission's prior determination rejecting the demand for a "fresh look;" i.e., an abrogation of existing valid contracts between Ameritech Michigan and its customers. Once again, the Commission already addressed that issue clearly and succinctly when it rejected such a proposal in Case No. U-10647. See Ameritech Michigan's response to Brooks Fiber, January 15, 1997, p. 5.

### **CONCLUSION**

Significantly, MFS has not identified any instance where Ameritech Michigan is not offering the interconnection services and unbundled network elements mandated by the competitive checklist in the federal Act. To the extent that MFS has identified operational issues, Ameritech Michigan will continue to work with MFS to address concerns through the business relationship between the parties and, if necessary, the dispute resolution procedures in the interconnection agreement between the parties as approved by the Commission.

Respectfully submitted,

**AMERITECH MICHIGAN**

  
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444 Michigan Avenue, Room 1750  
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(313) 223-8033

DATED: January 31, 1997

0.

**MFS Now Offering Local Telephone Services Over Its Own Fiber Network  
In Detroit**

DETROIT, May 29 /PRNewswire/ -- MFS Communications Company, Inc. (MFS) announced today that it is now offering a full range of local, facilities-based telephone services over its 103-route-mile, fiber-optic network in the greater Detroit metropolitan area.

"We're committed to delivering personalized customer service and tailored communications solutions, supported by our reliable state-of-the-art network facilities, to Detroit-area businesses of all sizes," said Ronald Beaumont, president and CEO of MFS North America. "Our customers rely on us to be the single point-of-contact for their telecommunications needs. This gives them the freedom to focus on what they do best -- growing their businesses."

MFS Intelenet, a unit of MFS, has been providing resale-type local telephone services to over 1,000 customers in Detroit since 1991, and greatly expands its presence in the greater metropolitan Detroit area, with this end-to-end service offering over MFS' network.

MFS Intelenet offers one-stop shopping for communications services to medium and small businesses. It provides local telephone service, domestic and international long-distance service and a variety of enhanced services -- voice mail, calling card, 800/888 number services, customized billing and management reports.

Since September 1995, MFS Telecom, another operating unit of MFS, has been serving large business and government customers in Detroit by providing critical fiber links directly from a customer's location to long-distance carriers or to other customer locations. MFS Telecom is now also offering its customers local telephone services over MFS' fiber-optic network.

Last week, MFS and Ameritech signed a landmark interconnection agreement that covers Ameritech's five-state region, including Michigan. This is the first agreement between a Regional Bell Operating Company and a facilities-based competitor, which seeks to satisfy specific requirements of the Telecommunications Act of 1996.

MFS is a leading provider of communication services for business and government. Through its operating subsidiaries, MFS provides one-stop shopping for integrated local and long-distance services as well as a wide range of high-quality voice, data and other enhanced services and systems specifically designed to meet the requirements of business and government customers. MFS' common stock is traded on Nasdaq under the symbol MFST. MFS is headquartered in Omaha, Nebraska.

/CONTACT: Josh Howell or Claire Dunnott, 708-218-7232, or Investor Relations, Gary Brandt, 402-231-3432, all of MFS/ 14:52 EDT

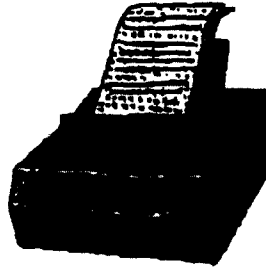
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COVER PAGE



Date: 1/27 197

Number of Pages (including cover): 5

TO:

De Morgan

COMPANY:

Ameritech

NUMBER:

312-335-2927

FROM:

Richelle Teter

FAX NUMBER:

630/203-0569

PHONE NUMBER:

630-203-7020

COMMENTS:

Please call if you don't receive all pages.

*Please call me once you've  
received this information  
Thanks Joe. Richelle*

## Consolidated List of Customers with MFS NXX Issues

1.  
Calling from: 708 424-XXXX (Evergreen Park)  
Calling to: 708-918-XXXX (Homewood)  
Comments: Told this was a Toll call

2.  
Calling from: 630-262-XXXX (Geneva)  
Calling to: 630-998-XXXX (Geneva)  
Comments: Told by Ameritech Operators that their new MFS exchanges were considered toll (Area B) phone calls.

3.  
Calling from: 313-284-2141  
Calling to: 313-629-0586

Comments: The following information was told to the customer.... "The numbers are so new that information operators may not have them in their data base..." "No such exchange in the 313 area. (629) Not in the Ameritech data base."

4.  
*Studio City, CA Calls*  
Studio City, CA (818-980-XXXX)  
Calls to: 818-742-0501

Comments: Calls cannot be completed ...

Calls to: 818-638-0501  
Comments: Call works to Glendale

5.  
*El Segundo, CA*  
El Segundo, CA (310-726)  
Calls to: 310-953-0501 -  
Comments: Fast Busy

Calls to: 310-765-0501  
Comments: Can't be completed as dialed

6.  
*Passport Users:*  
Calling from: 810-642-XXXX  
Calling to: 810-365-XXXX

Comments: Receiving the LD error message, "You must first dial a one ..."

7.  
Calling from 810-775  
Calling to: 810-819

Jan-30-97 12:14P

P.05

Comments: Treated as toll Calls

8.

Calling from: 313-729-8461

Calling to: 313-749-0040

Comments: They dial 7 digits and receiving call that they cannot be completed as dialed.

Date: January 27, 1997  
Page 2

R-98%

01-30-97 12:20PM P005 #18



444 Michigan Avenue  
Room 1750  
Detroit, MI 48226  
Office: 313-223-8033  
Fax: 313-496-9326

Craig A. Anderson  
Counsel

January 31, 1997

Ms. Dorothy Wideman  
Executive Secretary  
Michigan Public Service Commission  
P.O. Box 30221  
Lansing, MI 48909

MICHIGAN PUBLIC SERVICE  
FILED

JAN 31 1997

***Re: MPSC Case No. U-11104.***

COMMISSION

Dear Ms. Wideman:

Enclosed for filing in the above-referenced case is an original and fifteen copies of Ameritech Michigan's Reply to Brooks Fiber's Second Submission of Information.

Very truly yours,

*Craig A. Anderson (ls)*

Enclosure

cc: All Parties of Record

CAA:jkt



STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, )  
to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 ) Case No. U-11104  
of the Telecommunications Act of 1996. ) FILED  
MICHIGAN PUBLIC SERVICE

JAN 31 1997

**AMERITECH MICHIGAN'S REPLY TO BROOKS FIBER'S  
SECOND SUBMISSION OF INFORMATION**

Ameritech Michigan<sup>1</sup> submits the following additional information regarding matters addressed in the letter from Brooks Fiber Communications (Brooks Fiber) dated January 17, 1997 to the Michigan Public Service Commission, which was received by Ameritech Michigan on January 23, 1997.

Ameritech Michigan has contacted Brooks Fiber to address the business and operational issues raised in their letter to the Commission. The purpose of this filing is to advise the Commission of Ameritech Michigan's positions and proposed course of action regarding the allegations raised by Brooks Fiber. Ameritech Michigan's commitment is to work cooperatively with Brooks Fiber under the framework and procedures of our approved interconnection agreement and all applicable laws and regulations to resolve each and every concern.

Brooks Fiber's most recent submission is, in large part, a reiteration of the same issues raised in its previous filing in this docket of a letter to the U.S. Department of Justice. Ameritech Michigan has already responded to many of

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<sup>1</sup>Michigan Bell Telephone Company, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Michigan Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" (used interchangeably herein), pursuant to assumed name filings with the state of Michigan.